

# Lowenstein Sandler LLP


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VIA ECF

Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 10/22/2020

**Re: United States v. Heidi Hong Piao, 15-cr-706 (VSB)**

Dear Judge Broderick:

This law firm represents Heidi Hong Piao in the above-referenced matter. With the consent of the government (via Assistant U.S. Attorney Daniel Richenthal), we write to request a postponement of the disclosure deadlines for the final presentence investigation report ("PSR")

Your Honor recently granted Ms. Piao's request to a three-month adjournment of her sentencing date. The sentencing is now scheduled for March 5, 2021. (Dkt. Entry No. 971.) Due to the medical issues that Ms. Piao is currently facing, and as I have explained in detail to both Mr. Richenthal and the Probation Office, we would also ask that the deadlines for finalizing the PSR similarly be postponed by three months, including to permit more time for Ms. Piao to review the draft PSR with counsel<sup>1</sup>. Should the Court require additional information, I would be happy to submit a letter under seal or to speak by phone.

Respectfully yours,

/s/ Jamie Gottlieb Furia

Jamie Gottlieb Furia

cc: Daniel Richenthal, Assistant U.S. Attorney (via ECF)  
Sara Willette, U.S. Probation Officer (via Email)

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<sup>1</sup> Mr. Richenthal and I spoke with the Probation Office, but the Probation Office would not consent to this request and, absent an order of this Court, plans to issue the final PSR in accordance with the disclosure rules set forth in the Standing Order (14 Misc. 141).